

EXHIBIT A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Attorneys for Debtors and Debtors in Possession

In re:

BLOCKFI INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 22-19361 (MBK)

(Jointly Administered)

**ORDER SHORTENING TIME PERIOD FOR NOTICE OF DEBTORS'
MOTION FOR ENTRY OF AN ORDER (I) AUTHORIZING AND
APPROVING THE SETTLEMENT AND RELEASE OF CLAIMS BY AND
AMONG BLOCKFI INC. AND DESERVE, INC. AND (II) GRANTING
RELATED RELIEF**

The relief set forth on the following page numbered two (2) is **ORDERED**.

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 100 Horizon Center Blvd., 1st and 2nd Floors, Hamilton, NJ 08691.

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Debtors: BLOCKFI INC., *et al.*

Case No.: 22-19361(MBK)

Caption of Order: ORDER SHORTENING TIME PERIOD FOR NOTICE OF DEBTORS' MOTION FOR ENTRY OF AN ORDER (I) AUTHORIZING AND APPROVING THE SETTLEMENT AND RELEASE OF CLAIMS BY AND AMONG BLOCKFI INC. AND DESERVE, INC. AND (II) GRANTING RELATED RELIEF

Upon review of the *Application for Order Shortening Time for Notice of Debtors' Motion for Entry of an Order (I) Authorizing and Approving the Settlement and Release of Claims By and Among BlockFi Inc. and Deserve, Inc. and (II) Granting Related Relief* (the "Application")¹ of the above-captioned debtors and debtors in possession (collectively, the "Debtors") for entry of an order (this "Order") requesting that the time period for the Deserve Settlement Motion be shortened pursuant to FED. R. BANKR. P. 9006(c)(1) and a hearing scheduled on October 10, 2023,

IT IS HEREBY ORDERED THAT:

1. A hearing will be conducted on the Deserve Settlement Motion on **Tuesday, October 10, 2023**, at **11:00 a.m. prevailing Eastern Time** before the Honorable Chief Judge Michael B. Kaplan, Clarkson S. Fisher United States Courthouse, 402 East State Street, Second Floor, Courtroom 8, Trenton, NJ 08608.

2. The Debtors must serve a copy of this Order, and all related documents, to all parties in interest by either overnight mail or email, as applicable.

3. Service must be made on the same day as the date of this Order.

4. Notice by telephone is not required.

5. Any objections to the Deserve Settlement Motion must be filed by **4:00 p.m. prevailing Eastern Time on Monday, October 9, 2023**.

6. Parties may request to appear by phone by contacting Chambers prior to the return date.

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Application.